

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PURDUE RESEARCH FOUNDATION,	§	
	§	
Plaintiff,	§	PUBLIC VERSION
	§	
v.	§	Case No. 6:22-cv-00119-ADA
	§	
GOOGLE LLC,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	

**DECLARATION OF ERIKA WARREN IN SUPPORT OF
DEFENDANT’S OPPOSED MOTION UNDER 28 U.S.C. § 1404(a) TO
TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Erika Warren, declare and state as follows:

1. I am an attorney at Warren Lex LLP, 2261 Market Street, No. 606, San Francisco, California, 94114, and counsel of record in this matter for defendant Google LLC (“Google”). I make this declaration in support of Defendant’s Opposed Motion Under 28 U.S.C. § 1404(a) to Transfer Venue to the Northern District of California. I have personal knowledge of the facts stated herein and, if called to testify, could and would competently testify thereto.

2. Attached hereto as Exhibit A is a true and correct copy of
<https://www.prf.org/about/index.html>.

3. Attached hereto as Exhibit B is a true and correct copy of
<https://www.prf.org/contact/index.html>.

4. Attached hereto as Exhibit C is a true and correct copy of
<https://www.prf.org/about/administration.html>.

5. Attached hereto as Exhibit D is a true and correct copy of
<https://www.linkedin.com/in/brian-edelman-a43a602b>.

6. Attached hereto as Exhibit E is a true and correct copy of a Business Entity Report filed by Purdue Research Foundation with the Indiana Secretary of State on December 10, 2020.

7. Attached hereto as Exhibit F is a true and correct copy (with email addresses removed for privacy) of an email from Michael Shore, counsel for Purdue Research Foundation, to [REDACTED] Patent Counsel at Google, on December 3, 2021.

8. Attached hereto as Exhibit G is a true and correct copy of
<https://www.linkedin.com/in/ycharliehu>.

9. Attached hereto as Exhibit H is a true and correct copy of
<https://www.linkedin.com/in/abhilashjindal>.

10. Attached hereto as Exhibit I is a true and correct copy of
<https://abhilash-jindal.com/teaching/2021-2-col-733/>.

11. Attached hereto as Exhibit J is a true and correct copy of
<http://mobileenerlytics.com/>.

12. Attached hereto as Exhibit K is a true and correct copy of
<https://www.linkedin.com/in/abhinav-pathak-a5aba622>.

13. Attached hereto as Exhibit L is a true and correct copy of
<https://www.linkedin.com/in/sam-midkiff-27868130>.

14. Attached hereto as Exhibit M is a true and correct copy of
<https://android.googlesource.com/platform/tools/base/+/refs/heads/mirror-goog-studio-main/lint/libs/lint-checks/src/main/java/com/android/tools/lint/checks/WakeLockDetector.java>.

15. Attached hereto as Exhibit N is a true and correct copy of PRF's Preliminary Infringement Contentions served on May 26, 2022.

16. Attached hereto as Exhibit O is a true and correct copy of <https://android.googlesource.com/platform/tools/base/+log/refs/heads/mirror-goog-studio-main/lint/libs/lint-checks/src/main/java/com/android/tools/lint/checks/WakelockDetector.java>.

17. Attached hereto as Exhibit P is a true and correct copy of <https://android-review.googlesource.com/q/file:WakelockDetector.java+branch:master+project:platform/sdk>.

18. Attached hereto as Exhibit Q is a true and correct copy of <https://android.googlesource.com/platform/tools/base/+blame/refs/heads/mirror-goog-studio-main/lint/libs/lint-checks/src/main/java/com/android/tools/lint/checks/WakelockDetector.java>.

19. Attached hereto as Exhibit R is a true and correct copy of U.S. Patent Application No. 2012/0084751.

20. Attached hereto as Exhibit S is a true and correct copy of <https://www.linkedin.com/in/makagon>.

21. Attached hereto as Exhibit T is a true and correct copy of <https://www.linkedin.com/in/nikolayanisimov>.

22. Attached hereto as Exhibit U is a true and correct copy of the assignment record of U.S. Patent Application No. 2012/0084751.

23. Attached hereto as Exhibit V is a true and correct copy of <https://www.genesys.com/contact-us>.

24. Attached hereto as Exhibit W is a true and correct copy of https://en.wikipedia.org/wiki/Compilers:_Principles,_Techniques,_and_Tools.
25. Attached hereto as Exhibit X is a true and correct copy of <http://infolab.stanford.edu/~ullman/>.
26. Attached hereto as Exhibit Y is a true and correct copy of <https://suif.stanford.edu/~lam/>.
27. Attached hereto as Exhibit Z is a true and correct copy of *Effective Interprocedural Resource Leak Detection* (2010) by Satish Chandra and Emina Torlak.
28. Attached hereto as Exhibit AA is a true and correct copy of <https://www.linkedin.com/in/satish-chandra-953a422>.
29. Attached hereto as Exhibit BB is a true and correct copy of *Constructing Precise Control Flow Graphs from Binaries* (2009) by Liang Xu, Fangqi Sun and Zhendong Su.
30. Attached hereto as Exhibit CC is a true and correct copy of <https://www.linkedin.com/in/dennisxl>.
31. Attached hereto as Exhibit DD is a true and correct copy of <https://www.linkedin.com/in/fangqi-sun-7ba41016>.
32. Attached hereto as Exhibit EE is a true and correct copy of <https://en.wikipedia.org/wiki/Coverity>.
33. Attached hereto as Exhibit FF is a true and correct copy of <https://scan.coverity.com/projects/mesa>.
34. Attached hereto as Exhibit GG is a true and correct copy of <https://www.synopsys.com/company/contact-synopsys/office-locations.html>.

35. Attached hereto as Exhibit HH is a true and correct copy (with email addresses removed for privacy) of an email from Michael Shore, counsel for PRF, to [REDACTED], Patent Counsel at Google on December 3, 2021.

36. Attached hereto as Exhibit II is a true and correct copy of https://www.uscourts.gov/sites/default/files/fcms_na_distprofile0331.2022.pdf.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on June 9, 2022, in San Francisco, California.


Erika Warren